

# COHEN & GREEN

October 3, 2022

Hon. Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

By Electronic Filing.

**Re: Case No. 21-cv-06667, Vergara v. Town of Babylon**

Dear Judge Tiscione:

My firm, with co-counsel represents the Plaintiffs in the case named above. We write, with Defendants' consent, to ask that the Court enter a temporary *sine die* extension of all deadlines, and allow the parties to submit an amended discovery plan.

Without saying too much on a public docket, one of Plaintiffs' counsel — who has been in a co-lead legal role, as well as being the person in the primary and sole client-facing role — has been having serious health issues. That has caused issues both in getting necessary discovery tasks done as well as coordinating those tasks. Plaintiffs are admittedly rather overdue in serving their discovery responses, and have not yet served the core requests they intend to.

We therefore ask — and Defendants have very graciously consented — that the Court grant a brief *sine die* extension of all deadlines, so that Plaintiffs' counsel can internally reorganize tasks and workload to account for who is physically capable of doing the necessary work, and to then propose a new discovery and case management schedule.

As a control date, we ask that the Court set a deadline of October 31, 2022 for that proposed amended schedule, and as ever, thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by ECF.